

COMMONWEALTH OF PENNSYLVANIA



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December 21, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

Re: Petition of Duquesne Light Company for
Approval of its Act 129 Phase II Energy
Efficiency and Conservation Plan
Docket No. M-2012-2334399

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Comments in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Sincerely,

A handwritten signature in cursive script that reads "David T. Evrard".

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870

Enclosures

cc: Hon. Dennis J. Buckley, ALJ
Certificate of Service

163290

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Duquesne Light Company :
for Approval of its Act 129 Phase II : Docket No. M-2012-2334399
Energy Efficiency and Conservation Plan :

COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

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Dated: December 21, 2012

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I. INTRODUCTION

The Office of Consumer Advocate (OCA) is filing these Comments in accordance with the Notice in the *Pennsylvania Bulletin* published December 1, 2012. 42 Pa.B. 7371. This filing is in response to the Petition of Duquesne Light Company (Duquesne or Company) for Approval of its Energy Efficiency and Conservation (EE&C) Phase II Plan. In addition to these Comments, the OCA will present the written testimony of its witness, Dr. David Hill¹ on January 3, 2013, in the evidentiary phase of this proceeding. An evidentiary hearing will be held on January 18, 2013, at which time the OCA's testimony will be moved into the record. The OCA requests that these Comments be read and considered in conjunction with the testimony of Dr. Hill.

A. Background

On November 14, 2008, Act 129 of 2008 (Act 129) became effective. Act 129 contained a requirement for the Pennsylvania Public Utility Commission (Commission) to implement an Energy Efficiency and Conservation Program for Electric Distribution Companies (EDCs) with more than 100,000 customers. See 66 Pa.C.S. § 2806.1 *et seq.* The seven largest EDCs—PECO Energy Company (PECO), PPL Electric Utilities, Inc. (PPL), the FirstEnergy Companies (Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company), and Duquesne Light Company filed their Phase I EE&C Plans in the summer of 2009. These Phase I Plans expire on May 31, 2013.

On August 3, 2012, the Commission entered its Phase II Implementation Order, tentatively adopting EDC-specific targets for reducing energy consumption for the next EE&C

¹ Dr. Hill is the manager of Vermont Energy Investment Corporation's (VEIC) renewable energy consulting division. He has a Masters Degree in Appropriate Technology and a Ph.D. in Energy Management and Policy Planning, both from the University of Pennsylvania. Dr. Hill has over 17 years of experience in planning, evaluation and implementation of energy efficiency and renewable energy programs.

Program term (June 1, 2013-May 31, 2016). Energy Efficiency and Conservation Implementation Order, Docket Nos. M-2012-2289411 and M-2008-2069887 (Order entered August 3, 2012) (Phase II Implementation Order). As part of that Order, each EDC was given an EDC-specific Phase II consumption reduction target. Duquesne's Phase II target was set at 2.0% of its expected sales for the June 1, 2009 through May 31, 2010 period. Phase II Implementation Order at 24. The Commission also directed that: (1) 10% of overall consumption reductions come from the Government/ Institutional/ Non-Profit sector; (2) a plan's portfolio of measures include a proportionate number of low-income measures, and (3) EDCs obtain a minimum of 4.5% of their consumption reductions from the low-income sector. Id. at 45-57. As in Phase I, the total resource cost (TRC) test will continue to be used to evaluate each EDC's Plan. Id. at 78-83.

Act 129 caps annual spending on the Plan at 2% of the EDC's total revenues for calendar year 2006. 66 Pa.C.S. § 2806.1(g); see gen'ly Phase II Implementation Order at 100-119. The Act provides for full and current cost recovery of the Plan costs through an automatic adjustment rider, but prohibits the recovery of lost revenues by the EDC. 66 Pa.C.S. § 2806.1(b)(1)(H). The costs incurred are to be allocated to the classes that directly benefit from the measures implemented, unless a system-wide benefit can be shown.

The Phase II Implementation Order also details the Plan approval process. According to the Order, the EDCs were to file their proposed Plans by November 1, 2012, and the Commission was to publish the Plans in the *Pennsylvania Bulletin* within 20 days of filing.² An Answer along with comments and recommendations is to be filed within 20 days of

² Due to Hurricane Sandy, the Commission issued a Secretarial Letter extending the Plan submission filing date to November 15, 2012 and the Commission Order date to March 15, 2012. Duquesne filed its Plan on November 15th, and the Plan was published in the *Pennsylvania Bulletin* on December 1, 2012. 42 Pa.B. 7371.

publication. The Plans would be referred to the Office of Administrative Law Judge (ALJ) and be scheduled for hearings to be completed no later than the 65th day after the Plan is filed. The Commission will approve or reject all or part of the plan at public meeting within 120 days of the EDC's filing. Phase II Implementation Order at 61-62. Duquesne's Plan was filed on November 15th, and the Commission Order is due in this matter by March 14, 2013. On December 10th, ALJ Dennis J. Buckley held a prehearing conference. At that conference, the Parties agreed to a procedural schedule that calls for the Parties (other than Duquesne) to submit Direct Testimony on January 3, 2013; submit Rebuttal Testimony on January 15, 2013; conduct an evidentiary hearing on January 18, 2013; submit Main Briefs on January 28, 2013; and submit Reply Comments on February 7, 2013. The evidentiary record will be certified to the Commission on February 14, 2013, for consideration and vote by the March 14, 2013 deadline.

The OCA provides the following Comments on Duquesne's Plan in accordance with the Commission's Phase II Implementation Order.

B. The Stakeholder Process

In preparation for the Phase II EE&C program, Duquesne held a series of stakeholder meetings in August 2012. Meetings were convened for each EE&C customer class – Residential, Small Commercial and Industrial, Large Commercial and Industrial, and Government /Nonprofit /Institutional. The purpose of the meetings was to solicit input regarding program segmentation and a review of the Phase I programs to determine successes and needed improvements. In addition to the stakeholder meetings, Duquesne also held a webinar with its trade allies to solicit further input in preparing its Phase II plan. The OCA recommends that the Commission direct Duquesne to continue these stakeholder efforts.

C. Legal Standards

A number of standards are considered by the Commission in determining whether the EDC's EE&C Plan should be approved. 66 Pa.C.S. § 2806.1(a). Most of these standards deal with the evaluation and modification of the Plan and were previously implemented as part of Phase I. See 66 Pa.C.S. §§ 2806.1(a)(2) (monitoring and verifying data collection), 2806.1(a)(4) (evaluating how Plans will meet or achieve consumption reduction goals), 2806.1(a)(6) (amending and modifying Plans), 2806.1(a)(7). Other, more general standards, must also be achieved as part of each EDC's Plan. For example, Act 129 states that each Plan must include a variety of energy efficiency and conservation measures and that such measures must be provided equitably to all classes of customers. 66 Pa.C.S. § 2806.1(a)(5). Further, cost recovery must be structured in such a manner to ensure that approved measures are financed by the same customer class that will receive the direct benefits of those measures. Id. at § 2806.1(a)(11).

Act 129 also specifically requires each EDC to demonstrate, *inter alia*, that its Plan is both cost effective using the TRC test and provides a diverse cross section of alternatives for customers of all rate classes. See 66 Pa.C.S. § 2806.1(b)(1)(i)(I). In the Act, a TRC test is defined as:

[A] standard test that is met if, over the effective life of each plan not to exceed 15 years, the net present value of the avoided monetary cost of supplying electricity is greater than the net present value of the monetary cost of energy efficiency conservation measures.

66 Pa.C.S. § 2806.1(m). The TRC will continue to be used to evaluate each EDC's Phase II Plan. Phase II Implementation Order at 78-83. The revised TRC test for the Phase II Plans was adopted by the Commission at its August 30, 2013 Public Meeting. 2012 PA Total Resource Cost (TRC) Test, Docket No. M-2012-2300653 (Order entered August 30, 2012).

Finally, as was discussed above, in its Phase II Implementation Order, the Commission directed that each Company's Plan be developed to include a series of specific carve-outs. The carve-outs are as follows: (1) 10% of overall consumption reductions must come from the Government/ Institutional/ Non-Profit sector; (2) a Plan's portfolio of measures must include a proportionate number of low-income measures, and (3) EDCs must obtain a minimum of 4.5% of their consumption reductions from the low-income sector. Id. at 45-57. As part of the carve out for the Government/Non-Profit/Institutional (GNI) sector, the Commission directed the EDCs to give special emphasis and consideration to multifamily housing units. Id. at 49-51.

The OCA submits that, in addition to reviewing the Company's proposed Plan for its potential to achieve the 2.0% consumption reduction target, Duquesne's Plan must also be reviewed to ensure that it is designed to meet all of aforementioned goals and targets in a cost-effective manner.

D. Summary of Duquesne's Plan

On November 15, 2012, Duquesne filed its Petition and Phase II EE&C Plan with the Commission. The Phase II Plan is designed to reduce total energy consumption between June 1, 2013 and May 31, 2016 by 2.0% of Duquesne's sales for the June 1, 2009 through May 31, 2010 period. Petition at 4. To achieve this goal, the Company proposes a Plan consisting of nineteen energy efficiency programs, fifteen of which were components of its Phase I Plan and four of which are new programs. The new programs were added based on an analysis of and experience with the Phase I Plan. Petition at 6-7. Specifically, the Company has proposed the following six programs for the residential class: (1) the Residential Energy Efficiency Rebate Program (REEP), (2) the School Energy Pledge Program, (3) the Residential Appliance

Recycling Program, (4) the Residential Home Energy Reporting Program, (5) the Residential Whole House Retrofit Program, and (6) the Low Income Energy Efficiency Program. Id. at 6. In addition to the programs for the residential class, Duquesne has proposed a Multifamily Housing Retrofit Program which will be administered as part of its GNI sector programs. Duquesne St. 1 at 10-12.

Duquesne's portfolio of programs is designed to provide customer benefits while also meeting the energy saving goals set forth in the Phase II Implementation Order within the designated expenditure cap of two percent (2%) of 2006 annual revenues (approximately \$19.5 million) for each year of the three year plan. Petition at 4. The Plan has budgeted expenditures totaling \$58.6 million which are broken down by class as follows: Residential- \$26.6 million; Small & Medium Commercial - \$7.6 million; Small & Medium Industrial - \$0.3 million; Large Commercial - \$11.9; and Large Industrial - \$12.0 million. Duquesne St. 2, Exh. WVP-3.

Duquesne will recover its costs through an Energy Efficiency and Conservation and Demand Response Surcharge (EECDR Surcharge) that will be imposed under Section 1307 and will be both reconcilable and non-bypassable. Duquesne St. 2 at 5. A separate recovery charge will be established for each customer class, corresponding to the costs of the programs that target that class, and will include the costs of the EE&C Plan, the Statewide Evaluator (SWE) costs, and the Gross Receipts Tax (GRT). Duquesne St. 2 at 3, 4, 5, 8, and 9. Initially, the EECDR surcharge rates for each class are projected to be as follows:

Class	Projected Rate*
Residential	\$0.0022/kWh
Small & Medium Commercial	\$0.0009/kWh
Small & Medium Industrial	\$0.0005/kWh
Large Commercial (Fixed)	\$116.97/Month
(Variable)	\$0.39/kW
Large Industrial (Fixed)	\$691.97/Month
(Variable)	\$0.72/kW

*Rate Information from Duquesne St. 2, Exh. WVP-4.³

Phase I costs will be tracked and reconciled separately from Phase II costs and revenues. Petition at 13-14. All costs attributable to Phase I will be accounted for by May 31, 2013 with few exceptions. From June 1, 2013, all costs associated with the Phase II program plan will be identified and tracked in Duquesne's Project Management Reporting System. As with the Phase I program years, Duquesne will reconcile the EECDR on an annual basis, filed with the Commission on July 1, for a revised surcharge to be effective on September 1. Petition at 13-14.

II. PRELIMINARY COMMENTS ON THE PLAN AND PROGRAMS

A. Phase II Residential Customer Programs

1. Residential Energy Efficiency Rebate Program (REEP)

This program encourages customers to make an energy efficient choice when purchasing household appliances and equipment. The program provides educational material on energy efficient options and offers rebate incentives. The educational material and rebates are provided in conjunction with Duquesne's online home energy audit. The audit asks customers

³ The fixed and variable charges for the large commercial and industrial classes are a result of Duquesne's Phase I Order in which the Commission directed that the administrative costs of the EE&C programs for these classes should be collected through a fixed charge and the various program incentive charges should be collected through a variable demand charge based on a customer's Peak Load Contribution.

questions about home energy use and provides immediate results. Customers see a menu of approved energy efficiency measures and rebate amounts. The rebates will reduce the cost of replacing outdated and inefficient appliances and equipment. Plan at 22. The program rebates (incentives) are designed to offset approximately one-third of the incremental cost of installing energy efficient appliances or equipment. Id. at 23. Duquesne projects REEP as having a TRC score of 1.4.

With respect to REEP, the OCA will review issues including, but not limited to, (1) whether the proposed measures are reasonably calculated to achieve the proposed savings; (2) whether the proposed measures are cost-effective; and (3) whether the Plan reflects changing lighting baselines and strategies for transitioning to new lighting technologies and/or other strategies.

2. School Energy Pledge Program

The School Energy Pledge program uses the schools market (in the primary grades, K-5) to provide energy efficiency services to hard-to-reach residential populations. Students learn about energy efficiency at school and have their families sign a pledge to install energy efficiency measures at home. The measures come in the form of an energy saving toolkit that includes CFLs, LED night lights and a smart strip. Duquesne's projections for Phase II are based on introducing the program in 70 schools and achieving a 50 percent participation rate in those schools, reaching approximately 14,000 students. In Phase I, Duquesne achieved a participation rate close to 70 percent. Duquesne projects a TRC score of 1.5 for this program. Plan at 26-29. The OCA intends to review this program to: (1) assess the persistence of the savings achieved under this program; (2) examine the realization and use rates of this program; (3) examine the potential overlap between this program and other residential programs to

determine if savings are being properly accounted for; and (4) whether the program measures are cost-effective.

3. Residential Appliance Recycling Program

This program encourages residential customers to turn in their operating older refrigerators and freezers to be recycled. Customers who do so receive a check for \$35. Duquesne estimates that approximately 42,000 households in its service territory operate more than one refrigerator or freezer. In Phase I, nearly 9,000 units were recycled. Duquesne projects recycling in excess of 7,000 units in Phase II. Duquesne projects a TRC score of 2.8 for this program. Plan 29-32. The OCA will review issues including, but not limited to: (1) whether the appropriate appliances have been included in this program; (2) whether the proposed incentive rebate levels are reasonable and appropriate; (3) whether the proposed measure is reasonably calculated to achieve the proposed savings levels; and (4) whether the proposed measure is cost-effective.

4. Residential Home Energy Reporting Program

This program targets 50,000 high use customers, including 4,200 who are low income customers. These households are mailed a Home Energy Report (HER) every two months. The HER compares the household's energy consumption for the last two months to: 1) the most efficient (top 20%) of the peer group; and 2) the entire peer group. The objective is to educate these high use customers on electricity consumption and to change their household behaviors leading to less consumption. Duquesne states that the HERs generate verifiable savings of between 1.5% and 3.5% of total home energy use. The Company projects a TRC score of 1.7 for this program. Plan at 32-34. The OCA will review issues including, but not limited to: (1) whether the proposed measures are reasonably calculated to achieve the proposed

savings; (2) whether the proposed measures are cost-effective; (3) whether the proposed savings can be maintained over a period of time; and (4) whether there is any potential double-counting of savings as a result of overlapping measures with other residential programs.

5. Residential Whole House Retrofit Program

Under this program, which is new for Phase II, residential customers receive a comprehensive home energy audit, installation of measures from a Home Energy Audit Kit, and information about available rebates. The objective of the program is to educate customers about the efficiency of their home as a system and to encourage more comprehensive retrofit activity than is done in response to typical equipment rebates. Duquesne proposes to make this program available to both low-income (below 150% of poverty guidelines) and non-low-income customers. Non-low-income customers will receive a \$250 credit toward the cost of a home energy audit. Low-income customers will receive the audit free of charge. Installation of the Home Energy Audit Kit measures will be done for both groups free of charge. The cost of measures taken beyond the Kit will be assisted by rebates available through the Company and financing provided through coordination with Keystone Home Energy Loan Program. Duquesne projects a TRC score of 0.4 for this program. Plan at 34-37. The OCA's review of this program will examine: (1) whether the proposed measures are reasonably calculated to achieve the proposed savings; (2) whether the proposed measures are cost-effective; and (3) whether there is any potential double-counting of savings as a result of overlapping measures with other residential programs

6. Low-Income Energy Efficiency Program (LIEPP)

This is not really a separate program, but rather a combination of all of the other residential programs that will work together to enable Duquesne to meet the requirement that at

least 4.5% of its consumption reductions come from the low-income sector. The Company projects that of the “contributing” programs, the largest percentage of LIEPP energy savings will come from the Residential Behavioral Savings Program (30.6%), while the greatest resources will be spent for the Whole House Retrofit Program (69.9%). Projected savings and costs attributed to the “contributing” programs are as follows:

Low Income Projected Savings* Contributing Programs	Program kWh	Program Costs
Residential Energy Efficiency	21.7%	3.7%
Whole House Audit/Retrofit	24.5%	69.9%
Residential Appliance Recycling	12.3%	3.8%
School Energy Pledge	11.0%	12.3%
Residential Home Energy Reporting	30.6%	10.4%

* Source: Plan at 39

Duquesne projects the TRC score for LIEPP at 1.1. Plan at 38-41. Duquesne’s projected savings from LIEPP are 14,943 MWH. Plan at 15. The OCA will review issues including, but not limited to: (1) whether LIEPP savings are consistent with the Phase II Implementation Order target; (2) why Duquesne’s TRC score for LIEPP is lower than the low income programs of other EDCs; and (3) whether it is reasonable to assume that low income savings will come from participation of the low income population in other residential EE&C programs.

B. Multifamily Housing Retrofit Program

As noted above, Duquesne includes this program under its GNI sector programs. This will be a new program for Duquesne. More than 26% of the residential housing stock in Duquesne’s service territory is multifamily housing. The program will target multifamily housing units for low-income individuals. Duquesne notes that the majority of such buildings in

its territory are served under a commercial tariff because the buildings are master-metered. The services provided under this program will include energy efficiency audits, technical assistance for measure-level project review and aggregation, contractor negotiation and equipment bulk purchasing. Assistance will also be provided in arranging financing for approved projects. Duquesne projects a TRC score of 0.9 for this program. Plan at 79-81. The OCA will review issues including, but not limited to: (1) whether the program design addresses energy efficiency barriers that are specific to this market segment; (2) whether there is coordination in delivery with LIEPP and other affordable housing programs; (3) whether there are gaps in program measures, which, if closed, would improve program performance; and (4) whether allocation of costs and savings is clear.

C. Miscellaneous Issues

1. Total Plan Spending and Savings

In compliance with the requirements of the Phase II Implementation Order, Duquesne proposes spending \$58.64 million in Phase II to achieve a total of 332,066 MWh in savings. Of these 332,066 MWh, 276,700 MWh are mandated under the 2 % reduction target of the Phase II Implementation Order. The Company states that its portfolio savings objective is 20% above the mandated reduction in order to allow for an 80% measurement realization. The OCA will review the total Plan spending to ensure it complies with the mandated spending limit, it will compare projected savings to the 2% savings target and it will review Duquesne's plan to overcomply to account for the anticipated 80% measurement realization rate.

2. Allocation of Expenditures and Savings By Customer Class

Duquesne's proposed percentage of expenditures and savings by customer class are as follows:

Class	Percentage Spending	Percentage Savings
Residential	45.5%	46.3%
Commercial/Ind. Small	8.5%	4.6%
Commercial/Ind. Large	39.1%	36.3%
Governmental/Non-Profit	9.6%	10.0%

Source: Plan at 148, Table 2 and Plan at 154, Table 5.

The OCA will evaluate this proposal to ensure an equitable balance of program spending and savings opportunities among the customer classes.

3. Residential New Construction

Duquesne’s Phase II Plan does not include any program directed at the Residential New Construction (RNC) market. The OCA’s review will: (1) examine whether Duquesne’s omission of an RNC component from its Plan will result in lost opportunities for achieving cost-effective reductions; (2) discuss where and how RNC services, if offered, should be targeted.

III. CONCLUSION

The OCA appreciates this opportunity to provide these Comments and the testimony of its expert witness, Dr. David Hill, on this important topic.

Respectfully Submitted,



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December 21, 2012

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CERTIFICATE OF SERVICE

Petition of Duquesne Light Company :
For Approval of its Act 129 Phase II : Docket No. M-2012-2334399
Energy Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the foregoing, the Office of Consumer Advocate's Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of December 2012.

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